

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION: 04-CV-11069-JLT

ABRAHAM PHILIP, MD)
Plaintiff,)
vs.)
JOHN CRONIN, in his personal)
capacity.)
Defendant.)

)

PLAINTIFF'S AMENDED POTENTIAL EXHIBITS

This list of potential exhibits is keyed to a binder of documents the plaintiff has provided to the defense. Page number is followed by a brief description of the potential exhibit.

This is a list of POTENTIAL exhibits. The plaintiff may object to introduction of one or more of these exhibits depending upon rulings on motions in limine.

- 0001 First Amendment
- 0002 March 1, 2004 "problems" letter from Dr. Philip to Governor Romney
- 0007 March 1, 2004 "organ procurement" or "Joshua" letter to Gov. Romney
- 0008 The Strange Death of Joshua Memo
- 0011 Termination Letter by John Cronin

0012 John Cronin deposition excerpt

0016 OCME flow chart, January 2004

0017 Newspaper articles concerning various problems at OCME

0037 September 8, 2003 memo from Mr. Cronin to OCMD staff *re* media

0038 Blood-stained death certificate

0039 OCME Daily Case Roster for 2/13/2004

0042 E-mail chain among Dr. Philip, DA Armistead, Attorney Faherty

0044 E-mail from Dr. Philip to DA Armistead

0045 February 25, 2004 "one-day-off" letter from Mr. Cronin

0046 August 9, 2002 e-mail from Dr. Philip to Attorney Elaine Sharp

0047 Proposal for a Forensic Institute

0055 Memorandum from Dr. Evans and Dr. Philip to All Medical Examiners

0058 Memo from Dr. Philip to Mr. Cronin concerning Trooper Wesley Wanagel

0060 Draft proposal concerning "data management tools" from John Cronin and Dr. Philip

0064 Proposal to Perpetuate the Legacy of Lt. Edith Platt

0067 A Critique of the New Toxicology Forms (2/13/04)

0072 E-mail from Dr. Philip to John Cronin re 12 or 36 program

0073 January 14, 2004 E-mail from Dr. Philip to Mr. Cronin concerning 12 point program

0075 January 8, 2004 e-mail from Philip to Cronin concerning 12 point program

0076 Agenda for January 16, 2004 meeting with Mr. Cronin

0078 Agenda for January 30, 2004 meeting with Mr. Cronin

0079 "Reminder" e-mail to John Croning

0080 Agenda for July 12, 2001 meeting with Undersecretary Bolden

0082 Hand-written memo from Dr. Philip

0083 2/29/2004 e-mail from Armistead to Philip

0084 Letter to Rachel from Dr. Philip of "missed" cases at OCME

0087 Death certificates related to questionable nursing home and hospital deaths of (mostly) elderly patients not investigated by OCME

0103 Documents from "elevated morphine" case not investigated by OCMD

0110 E-mails between Dr. Vallaro and Dr. Philip concerning case documented at page 0103

0112 Documents pertaining to "Sandra J." case. High drug levels death not investigated by OCME

0121 Example of how toxicology studies are conducted in Syracuse, NY

0122 Drug panel used by New York City medical examiner office

0123 OCME drug test procedures

0127 Draft memo from Dr. Philip to Dr. Vallaro, John Cronin, and S. Habell

0129 Example of NYC toxicology laboratory report

0131 Example of Connecticut toxicology reports

0132 Fax cover sheet *re:* toxicology examples sent to Dr. Vallaro

0137 Examples of good toxicology reports and chain of custody from New Hampshire

0147 November 10, 2000 NAME letter and report to Dr. Evans

0155 September 19, 2002 Status of Forensic Services Report to Governor

0175 April 4, 2002 Needs Assessment of Forensic Services

0191 Death certificates and documents from questionable deaths not investigated by OCME

0193 Questionable death documents. Not investigated by OCME
0200 Questionable death documents. Not investigated by OCME
0202 Questionable death documents. Not investigated by OCME
0204 September 19, 2001 report to the Governor
0245 Same as above
0281 Final Report: Governor's Commission on Criminal Justice Innovation
0380 OCME policies and procedures
0593 1/6/04 memo from Dr. Philip to Jay Fitzgerald
0594 E-mail chain and e-mail to Armistead (duplicate)
0597 Workload Distribution chart
0598 Redacted letter from Ropes & Gray cc'd to OCME
0600 2/25/2004 "one day off" letter (duplicate)
0601 Termination letter (duplicate)
0602 Series of photographs of facilities at OCME
0603 March 2, 2004 e-mail from Dr. Philip to OCME staff

Respectfully Submitted,

/s/ Daniel S. Sharp

Daniel S. Sharp
Elaine Whitfield Sharp
Attorneys for Plaintiff
(BBO 565524)
196 Atlantic Avenue
Marblehead, MA 01945
781-639-1862

Certificate of Service

Daniel S. Sharp certifies that a copy of the document above was served by ECF on March 12, 2006 and in hand on counsel for all opposing parties on March 13, 2006 to:

Attorney Jean M. Kelly
Assistant Attorney General
One Ashburton Place
Boston, MA 02108-1598

/s/ Daniel S. Sharp
